

**BOROUGH OF AVALON**  
**EMERGENCY MEDICAL SERVICES**  
**3100 Dune Drive, Avalon, NJ 08202**

**KEVIN C. SCARPA, CHIEF**



February 21, 2011

Federal Communications Commission  
Washington, DC 20554

RE: Docket 09-19 Travelers' Information Service/AAIRO's "Petition for Ruling"

As a licensed Travelers Information Radio Station operator, I fully and emphatically support AAIRO's position regarding clarification and update of FCC Part 90.242 rules governing the Travelers Information Service. I firmly support the loosening of content restrictions to specifically permit NOAA Broadcasts (Routine and Non-Routine), Amber and Silver Alerts, and other security and hazard announcements over TIS systems.

Most of Avalon is in a flood plain zone that is subject to serious flooding conditions from the ocean and bay waters from hurricanes and northeasterly storms. Storms and Hurricanes can cause tidal flooding. The back bays present a problem during prolonged periods of onshore flow (North East Winds). In a winter storm or a Hurricane, a North East wind will prevent the high tide from draining out of the back bays. For each successive tide cycle that the back bays are not allowed to drain, the water levels increase. Once the tides rise near or above the elevation of the bulkhead, flooding will occur. The worst-case scenario is a hurricane which has a significant "storm surge."

Storm surge is simply water that is pushed toward the shore by the force of the winds swirling around the storm. This advancing surge combines with the normal tides to create the hurricane storm tide, which can increase the mean water level 15 feet or more. In addition, wind driven waves are superimposed on the storm tide. This rise in water level can cause severe flooding in coastal areas, particularly when the storm tide coincides with the normal high tides.

We purchased our TIS system, along with stationary remotely activated flashing lights and mobile variable message signs, to provide important life safety information to our highly out-of-town vacationing population during times of emergency. It is critical that we be able to carry out this function, when we feel it is necessary to do so, regardless of the exact nature of the life safety message that we choose to broadcast. We should not be limited to the narrow definition currently found in the TIS regulations. As such, we support AAIRO's recommendation to loosen, but not lift, content restrictions on these systems.

All disasters are local, and it is imperative that local operators have the expressed authority to broadcast, at their discretion, public safety information for the protection of life and property. The travelling public is a broad descriptor that at any given moment can represent a significant percentage of the total local population. The common thread for those falling under the description of travelling public, whether they are local residents or just passing through, is that they are all potentially victims of the same locally hazardous situation and they all deserve access to information that can facilitate their safe passage. I am also very supportive of eliminating the filtering requirement in Section §90.242(b)(8) as it generally renders our TIS station inaudible in the evening and over-night hours.

Respectfully,  
s/Kevin C. Scarpa, MPS, FF/MICP  
Deputy Coordinator, Borough of Avalon OEM

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